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***VIA ECF AND FEDERAL EXPRESS***

The Honorable Michael A. Shipp  
Martin Luther King, Jr. Federal Building & United States Courthouse  
50 Walnut Street  
Newark, NJ 07101

**Re: *Beverly Clark, et al. v. Prudential Insurance Co. of America,*  
Civil Action No. 08-6197 (DRD) (MAS)**

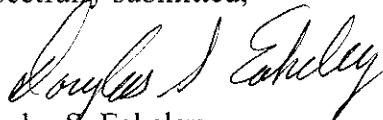
Dear Judge Shipp:

On March 30, 2011, the parties submitted a joint letter to the Court concerning the upcoming 30(b)(6) deposition of Prudential. In that submission, Prudential stated that it would submit to the Court today its position on the unresolved objections to plaintiffs' 30(b)(6) deposition notice, and give plaintiffs the opportunity to provide their position on those objections at the same time.

Plaintiffs have subsequently advised Prudential that they are prepared to proceed under a schedule whereby the parties will file a joint letter with the Court on April 5 explaining their respective positions on whatever objections are unresolved at that time. Accordingly, the parties will file a joint letter on April 5 addressing any remaining disputes concerning the Rule 30(b)(6) deposition. Based on the narrowing of issues in the parties' meet-and-confer discussions, we anticipate that the issues presented to the Court will be relatively few in number.

Prudential joins plaintiffs' request for telephonic request for a hearing on or about April 7, 2011 (depending on the Court's availability). Prudential proposes that during that hearing, the Court and the parties discuss all remaining disputes concerning the 30(b)(6) deposition of Prudential.

Respectfully submitted,



Douglas S. Eakeley  
*For Defendant The Prudential Insurance  
Company of America*

cc: All counsel of record (via ECF and email)

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